

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
VONDA KAY RICHARDSON	)	Case No. 18-30438-KLP
	)	Chapter 13
	)	Trustee: Suzanne E. Wade
Debtor	)	

**NOTICE OF APPLICATION BY KANE & PAPA, P.C.  
FOR SUPPLEMENTAL COMPENSATION**

Kane & Papa, P.C., counsel for the above debtor has filed a Supplemental Application for Allowance of Compensation pursuant to 11 U.S.C. §§ 330(a) and 503(b)(2) and Federal Rules of Bankruptcy Procedure 2016.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the application, or if you want the court to consider your views on the application, then, within fourteen (14) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, Virginia 23218-0508

- Attend the hearing scheduled for **January 27, 2021 at 10:00 a.m. at 701 East Broad Street, Room 5100, Richmond, VA 23219**. If no timely response has been filed, the Court may grant the relief sought in the application without a hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Application and may enter an Order granting relief sought in the application, and may enter an Order granting that relief without a hearing.

Dated: January 6, 2021

KANE & PAPA P.C.

By: /s/ James E. Kane  
James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218-0508  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

### **CERTIFICATE OF SERVICE**

I certify that on January 6, 2021, I have transmitted a true copy of the foregoing document electronically through the court's CM/ECF system or by mail to the debtor, chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, and to all necessary parties as listed on the matrix attached herewith.

/s/ James E. Kane  
James E. Kane  
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
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VONDA KAY RICHARDSON	)	Case No. 18-30438-KLP
	)	Chapter 13
	)	Trustee: Suzanne E. Wade
Debtor	)	

**APPLICATION BY KANE & PAPA, P.C.  
FOR SUPPLEMENTAL COMPENSATION**

**COMES NOW**, Kane & Papa P.C., counsel for debtor, and pursuant to 11 U.S.C. §§ 330(a), 331(b)(2), and 503(b)(2) and Federal Rules of Bankruptcy Procedure 2016, respectfully applies to the Honorable Court for approval and payment of supplemental fees in the amount of \$1,655.10, which includes attorney fees of \$1,645.00 and costs of \$10.10.

1. The period covered by this application is for additional work not included in the initial “no-look” fees through the date of this Application.
2. Fees in the amount of \$5,223.00 have either been previously paid by the debtor or approved for payment through the Chapter 13 Plan.
3. James E. Kane was admitted to practice law in 1989 and has been practicing for 31 years. The hourly rate charged by James E. Kane is \$350.00 per hour for attorney time, and \$100 per hour for Paralegal time.
4. Pursuant to Bankruptcy Rule 2016(b), a Disclosure of Compensation of Attorney for Debtor(s) has been filed in this case and Notice of Filing of Rule 2016-1 Disclosure of Compensation was served on the Debtor and the Standing Trustee pursuant to LBR 2016. No objection to the compensation requested in the Disclosure Statement has been filed by either the Standing Trustee or the Debtor.
5. Supplemental Compensation is requested for time and costs related to the following services:

**Professional services rendered to the debtor in connection with the preparation and filing of an Adversary Proceeding to Determine Validity, Extent and Priority of Lien pursuant to 11 U.S.C. § 506(a) filed on October 25, 2020, resulting in a judgment in favor of Debtor entered by the Court on November 25, 2020.**

6. An itemized statement of the charges is attached hereto and incorporated herein. Charges have not been included for the preparation and cost for noticing of the fee application and any court appearances related to the application.
7. James E. Kane has reviewed the Debtor's budget and believes that the Chapter 13 Plan provides sufficient reserves or may be extended in time so that payments requested herein may be made without prejudice to any creditor. Upon information and belief, payment of the requested compensation will not reduce the dividend to unsecured creditors as provided in the most recently confirmed Chapter 13 Plan.

**WHEREFORE**, Kane & Papa P.C., respectfully requests this Honorable Court to approve supplemental fees in the amount of \$1,655.10 to be paid through the Chapter 13 plan as an administrative expense claim pursuant to 11 U.S.C. 503.

Respectfully submitted,

KANE & PAPA P.C.

By: /s/ James E. Kane  
James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218-0508  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

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/s/ James E. Kane  
James E. Kane  
Counsel for Debtor

Kane & Papa, P.C.  
PO BOX 508  
RICHMOND, VA 23218 US  
804-225-9500  
jkane@kaneandpapa.com

## INVOICE

### BILL TO

Vonda Richardson  
9365 Brighter Tower Court  
#1404  
Glen Allen, VA 23060

INVOICE # 6317

DATE 01/06/2021

DUE DATE 02/01/2021

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/25/2020	<b>Consulting:Legal</b> Review property valuation on 9365 Brighter Tower Court, #1404, Glen Allen, VA from tax assessment; review first DOT and balance with US Bank; review Wilmington Savings DOT and balance	0.90	350.00	315.00
10/25/2020	<b>Consulting:Legal</b> Prepare Complaint against Wilmington Savings and both Trustees on DOT	1.40	350.00	490.00
10/28/2020	<b>Consulting:Legal</b> Review Summons and mail Summons and Complaint to Wilmington Savings and Trustees, and file certificate of service and file with court	0.80	350.00	280.00
10/28/2020	<b>Postage and Delivery</b> Postage and Delivery- Certified Mail to Wilmington Savings and First Class Mail to trustees; copy charges			10.10
11/13/2020	<b>Consulting:Legal</b> Review Answer filed by Defendants; email to Johnie Muncy regarding consent order; prepare consent order and email to Johnie Muncy; BOP order to Court	1.10	350.00	385.00
11/16/2020	<b>Consulting:Legal</b> Review email from court regarding changes to consent order; revise consent order and email to Johnie Muncy	0.30	350.00	105.00
11/24/2020	<b>Consulting:Legal</b> Review email from Johnie Muncy approving revised consent order and BOP to court	0.20	350.00	70.00

Richardson v. Wilmington Savings Fund Society, FSB, et. al.

BALANCE DUE

**\$1,655.10**

Label Matrix for local noticing  
0422-3  
Case 18-30438-KLP  
Eastern District of Virginia  
Richmond  
Wed Jan 6 14:10:11 EST 2021

6200 S. Quebec Street  
Greenwood Village, CO 80111-4720

Specialized Loan Servicing LLC  
Specialized Loan Servicing LLC  
6200 S. Quebec Street  
6200 S. Quebec Street  
Greenwood Village, CO 80111-4720

U.S. Bank National Association  
Robertson, Anschutz & Schneid  
6409 Congress Avenue  
Suite 100  
Boca Raton, FL 33487-2853

U.S. Bank National Association, as Trustee f  
C/O Shapiro & Brown, LLP  
501 Independence Parkway, Suite 203  
Chesapeake, VA 23320-5174

UST smg Richmond  
Office of the U. S. Trustee  
701 East Broad St., Suite 4304  
Richmond, VA 23219-1849

United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219-1888

Advance Financial  
ATTN: Virginia Billing  
100 Oceanside Drive  
Nashville, TN 37204-2351

American Web Loan  
2128 N. 14th St. Suite 1 #130  
Ponca City, OK 74601-1831

Cash Net USA  
175 W. Jackson Blvd.  
Suite 1000  
Chicago, IL 60604-2863

Credit One Bank Na  
Po Box 98873  
Las Vegas, NV 89193-8873

Dept Of Ed/Navient  
Attn: Claims Dept  
P.O. Box 9635  
Wilkes Barr, PA 18773-9635

Elastic  
c/o Republic Bank and Trust  
PO Box 950276  
Louisville, KY 40295-0276

Henrico Doctors Hospital  
Resurgent Capital Services  
PO Box 1927  
Greenville, SC 29602-1927

LVNV Funding, LLC its successors and assigns  
assignee of MHC Receivables, LLC and  
FNEM, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Mobiloansllc  
P.O. Box 1409  
Marksville, LA 71351-1409

Mr. Cooper  
Attn: Bankruptcy  
8950 Cypress Waters Blvd  
Coppell, TX 75019-4620

Navient Solutions, LLC on behalf of  
Department of Education Loan Services  
PO BOX 9635  
Wilkes-Barre, PA 18773-9635

Net Credit Financial  
Po Box 645295  
Cincinnati, OH 45264-5295

OneMain  
P.O. Box 3251  
Evansville, IN 47731-3251

OneMain Financial  
Attn: Bankruptcy Department  
601 Nw 2nd St #300  
Evansville, IN 47708-1013

Sage  
PO Box 240  
Commerce, GA 30529-0004

Shiva Finance LLC  
c/o Glen C. Watson, Attorney  
PO Box 121950  
Nashville, TN 37212-1950

Specialized Loan Servicing LLC  
6200 S. Quebec St.  
Greenwood Village, Colorado 80111-4720

Specialized Loan Servicing/SLS  
Attn: Bankruptcy  
Po Box 636005  
Littleton, CO 80163-6005

U.S. Attorney's Office  
919 East Main Street, Suite 1900  
Richmond, VA 23219-4625

U.S. Bank National Association  
Nationstar Mortgage LLC D/B/A Mr.Cooper  
Attn: Bankruptcy Dept  
PO Box 619096  
Dallas TX 75261-9096

Verizon  
by American InfoSource LP as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Wilmington Savings Fund Society,FSB Trustee(  
c/o Specialized Loan Servicing LLC  
8742 Lucent Blvd, Suite 300  
Highlands Ranch, Colorado 80129-2386

James E. Kane  
Kane & Papa, PC  
1313 East Cary Street  
P.O. Box 508  
Richmond, VA 23218-0508

John P. Fitzgerald, III

Suzanne E. Wade

Vonda Kay Richardson

Office of the US Trustee - Region 4 -R

341 Dial 877-996-8484 Code 2385911

9365 Brighter Tower Court

701 E. Broad Street, Ste. 4304

7202 Glen Forest Drive, Ste. 202

#1404

Richmond, VA 23219-1849

Richmond, VA 23226-3770

Glen Allen, VA 23060-3790

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Specialized Loan Servicing LLC  
6200 S. Quebec Street  
Greenwood Village, CO 80111-4720

(d)U.S. Bank National Association  
Robertson, Anschutz & Schneid  
6409 Congress Avenue  
Suite 100  
Boca Raton, FL 33487-2853

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	2
Total	34